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- Note 1: The term "SAM" as used in these standards refers to a "self-activated machine" that is used for placing wagers and includes betting kiosks.
- Note 1: For any Nevada Gaming Control Board ("Board) authorized computer applications, alternate documentation and/or procedures which provide at least the level of control described by the applicable Internal Control Procedures ("ICP" or "ICPs") as determined by the Tax and License Division will be acceptable, and an ICP variation pursuant to Regulation 6.100 will be unnecessary.
- Note 2: The term "voucher" as used in these standards refers to a printed wagering instrument that has a fixed dollar wagering value that is redeemable for cash or cash equivalent.
- Note 32: A pari-mutuel book must also comply with the Race and Sports Book Minimum Internal Control Standards ICPs when not in conflict with, and if applicable to, the pari-mutuel operation.
- Note 3: As used in these ICPs, the term "operator of a call center" has the same meaning as in Regulation 26C.
- Note 4: As used in these ICPs, the term "hub" refers to the Nevada pari-mutuel systems operator used by pari-mutuel race books for commingling wagers with race tracks.
- Note 5: These ICPs apply to satellite and outstation books, as defined in Regulation 22, unless otherwise stated within these ICPs.
- Note 6: A "signature" on a document provides evidence of the person's involvement and/or authorization of the intentions reflected in the document. A signature is either handwritten or electronic.

A "handwritten signature" is typically in the form of a stylized script associated with a person. The stylized script signature may include the first letter of the person's first name along with the person's full last name. The "initials" of the person would does not meet the requirements of a "signature," or;

An "electronic signature" is defined in NRS 719.100. The "electronic signature" is to be linked with an electronic document which uniquely identifies the individual (e.g., employee, patron) entering the "signature."

- Note 7: Licensees utilizing wagering communications, as defined in Regulation 26C.010(17), will be required to follow Pari-Mutuel MICS as they relate to wagering communications.
- Note 8: If the pari-mutuel department utilizes wagering accounts, compliance with Cage and Credit ICPs for wagering accounts is required.

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Note 8: For all licensees utilizing wagering accounts [Regulation 5.225], the Cage and Credit and/or Information Technology Minimum Internal Control Standards (MICS) are required to be followed, pursuant to Regulation 6.090, as they relate to wagering accounts.

Betting Ticket and Equipment Wagering Procedures

- 1. All pari-mutuel wagers must be transacted through the pari-mutuel <u>computer</u> system. In case of computer failure between the pari-mutuel book and the hub, no tickets may be manually written.
- 2. Whenever a betting station is opened or closed for wagering or turned over to a new writer/cashier:
 - a. Tthe writer/cashier signs on or off; and
 - b. Tthe pari-mutuel computer-documents casino name, system creates a record indicating the station number;
 - c. The fact that the station was opened or closed;
 - d. Tthe writer/cashier's identifierty;, and
 - e. Tthe date and time.
- 3. Nonpari-mutuel wagers are prohibited at "pari-mutuel only" books.
- 4. A pari-mutuel race wager is not accepted after the occurrence of post time, as defined in Regulation 22.010(21).
- 4-5. Upon accepting a wager, a betting ticket record of the wager is created in duplicate the pari-mutuel computer system which contains: ticket number, date and time, and terms of the wager. The terms of the wager (listed as the "ticket description" in the pari-mutuel computer system reports) include: event/racing meet (or race track), event/race number, event/race date, wager selection (e.g., horse number), type of wager (e.g., win, place and show, etc.) and dollar amount wagered. The record of the wager is documented as follows:
 - a. An original which is transacted and issued through a betting ticket that includes the book's name and address is printerd and given to the patron-; and
 - Note: If a wager is placed using communications technology, an original betting ticket does not need to be created. Regulation 22.140(9)-26C.160 requires that all wagering communications shall-be-are electronically recorded (separate from the computer system) and retained for a period of 60 days.
 - b. A restricted-copy which is recorded pari-mutual computer system record is created concurrently with the generation of the original betting ticket. The and restricted record is not accessible to race and sports book employees personnel except for inquiry only functions.

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- Upon accepting a wager, the betting ticket which is created contains the following:
 - a. An alphanumeric ticket number.
 - b. Casino name and station number.
 - c. Racetrack, race number, horse identification or event identification, as applicable.
 - d. Type of bet(s), each bet amount, total number of bets, and total take.
 - e. Date and time.
- If a book voids a betting ticket then: 6.
 - a. A "void" designation is immediately branded by the pari-mutuel computer system on the ticket with the pari-mutuel computer system updated to reflect the void transaction. Alternatively, a ticket can be voided manually in the pari-mutuel computer system by inputting entering or scanning the ticket-sequence number to update the pari-mutuel computer system to reflect the void transaction and immediately writing for stamping a "void" designation on the original ticket.
 - b. Computer and not-in-computer All voids are signed by the writer/cashier and the a supervisor (who did not write the ticket) at the time of the void. The supervisor may be from another gaming department. For satellite books, the second signature can be a supervisor of the host property; and
 - c. Not-in-computer voids are either prohibited or, ilf not-in-computer voids are permitted, the date and time when the ticket was voided is stamped on the original and no adjustment to gross revenue may be made.
 - If the original ticket is unavailable (e.g., printer malfunction), a document is created to reflect the void transaction with the information required by ICP #6(b).
- Future wagers are accepted and processed in the same manner as regular wagers.

Payout Procedures

- 8-7. Prior to making payment on a ticket/voucher or crediting the winnings to the patron's account: patrons receiving payouts on winning tickets, event/race results are entered into the pari-mutuel computer system for computerized grading of all wagers. Unpaid winning ticket reports are restricted to authorized personnel independent of the race and sports book.
 - a. The cashier inputs the ticket/voucher sequence number into the cashier's terminal; or

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- b. For account wagers the computer system automatically updates the patron's account when the event results are posted.
- 9-8. After scanning by the writer/cashier, Tthe pari-mutuel computer system brands the ticket/voucher with a "paid" designation, the amount of payment, and date. Alternatively, or if a writer/cashier manually inputs enters or scans the ticket/voucher sequence number into the pari-mutuel computer system, the writer/cashier either immediately writes/or stamps the date, amount of payment, and a "paid" designation on the patron's ticket/voucher or attaches to the patron's copy a pari-mutuel computer system "paid" ticket which indicates a paid designation, ticket number, amount of payment, and date.
- 10-9. The <u>pari-mutuel</u> computer <u>system</u> is incapable of authorizing payment on a ticket <u>voucher</u>, which has been previously paid, a voided ticket <u>voucher</u>, a losing ticket, or an unissued ticket <u>voucher</u>.
- 11-10. In case of computer failure, tickets may be paid. In those instances where a pari-mutuel system failure has occurred and tickets are manually paid, a log will be maintained which includes:
 - a. Date and time of pari-mutuel computer system failure-;
 - b. Reason for failure-; and
 - c. Date and time the pari-mutuel computer system is restored.
- 42. All manually paid tickets are entered into the computer system as soon as possible to verify the accuracy of the payout (this does not apply to purged, unpaid winning tickets). All manually paid tickets must be regraded as part of the end-of-day audit process should the computer system be inoperative.
- 11. For all payouts which are made without a pari-mutuel computer system authorization, after manual grading of the ticket, the date and time must be stamped on the patron's copy, amount of the payment, and a "paid" designation is written or stamped on the patron's copy of the ticket.
- 12. For payouts made without pari-mutuel computer system authorization (i.e., system inoperative) the following are performed:
 - a. Prior to completing the payout, the book manager or other authorized supervisory personnel, reviews the documentation supporting and explaining the payout and signs the ticket as evidence of review; and
 - b. Once the pari-mutuel computer system is operational, personnel immediately enters all
 manually paid tickets into the pari-mutuel computer system to verify the accuracy of the amount
 paid for the tickets and the manual grading of the tickets. If the pari-mutuel computer system
 remains inoperative at the end of the day, the procedures required by ICP #27(c) are required.

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Note: Any manually paid tickets that were previously purged from the pari-mutuel computer system do not need to be entered into the pari-mutuel computer system.

13. Supervisory approval is required to access a patron's account when patron wagering, deposit or withdrawal activity has not occurred within the account for more than 180 days.

Checkout Procedures

- 14. Whenever the betting station is closed or the writer/cashier is replaced, the writer/cashier signs off and the computer documents the casino name, station number, the writer/cashier identifier, the date and time, and cash balance.
- 13. The pari-mutuel computer system indicates the amount of net cash that is in each writer/cashier station. A supervisor is required to access this information.
- 45-14. For each writer/cashier station, a summary report (e.g., count sheet) is completed at the conclusion of each shift including:
 - a. Computation of cash turned in for the shift, and any variances between the cash turn-in and the amount that the <u>pari-mutuel computer</u> system indicates <u>should be is</u> in each station-; and
 - b. Signatures of two employees who have verified the <u>net</u> cash <u>proceeds recorded in ICP #14(a)</u> computation <u>turned in for the shift</u>.
 - Note 1: ICP #14 is also to be performed whenever there is a change of a writer/cashier at a station during a shift. In such a case when the cash is transferred from one writer/cashier to the next writer/cashier, the cash summary report for the shift is to reflect for each writer/cashier and each station, the amount of cash turn-in and any variances between the cash turn-in and the amount of net cash that the pari-mutuel computer system indicates is in each writer/cashier station.
 - Note 2: ICP #14 does not apply to areas outside the race and sports book area (e.g., casino cage) that cash tickets.
 - Note 3: Alternatively, ICPs #13 #14 are performed for each writer/cashier rather than each writer/cashier station.

Employee Wagering

16. Pari-mutuel book employees are prohibited from wagering on pari-mutuel events while on duty. While not on duty pari-mutuel book employees can place wagers from the customer area in the race and sports book.

Computerized Reports

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Note: Documentation equivalent to the following ICPs #15 - #18, must be prepared for satellite books on a "per book" basis. Wagers placed using communications technology can be included in the documentation of the central site book that accepted and recorded the patron's wager.

- <u>17., 18-15</u>. Adequate documentation of all pertinent pari-mutuel information is generated by the <u>pari-mutuel</u> computer system and <u>This documentation is restricted to authorized personnel.</u>
- 18-16. This documentation is restricted to authorized personnel. The generation of end-of-day parimutuel computer system reports must be performed by, or observed by, an employee from a department independent of the race and sports book department. Each report indicates:
 - a. The date;
 - b. The book's name (or other identifier); and
 - c. The title of report.
 - Note: As used in ICP #17, pari-mutuel computer system report descriptions, the term "ticket description" refers to the terms of the wager as described in ICP #5.
- 19-17. The Pari-mutuel computer system documentation is created daily and includes, at a minimum, the following reports:
 - b-a. Transaction report which lists, by writer/cashier station, for each ticket sold, voided (ticket canceled), and payout (including refunds): Tticket/voucher number. Date/time of transaction date and time, writer/cashier station number, writer/cashier number, ticket description, and amount of transaction. The report lists, by writer/cashier, and in total, the amount of sales (write), voids, and payouts;
 - Note: The transaction report may be a combination of more than one report (e.g., one for write and one for payouts).
 - i-b. Session Voucher-sales/payments (by ticket, writer/SAM, and track/event). summary which lists, for each meet, each race, and in total by meet and for all meets: session gross sales, cancels, cancels from previous session sales, total sales, total sales from previous session, total sales for the session, and the previous session combined, refunds, and net sales;
 - Note: A "session" is a 24-hour day.
 - d.,I.c. Race prices report which lists for each meet's race: race date and time, race number, Results (winners and payout data). (e.g., Hhorse identifications or event identification), and payout amounts for the different Ttypes of wagers;

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- f-d. Cashed tickets report which lists, by meet, the tickets cashed including: ticket number, writer/cashier (or station number), ticket description, and amount of net dividend (Aamount of payouts (by ticket, writer, track/events, and total). The report lists the total amount of net dividends by meet and the grand total for all meets;
 - Note: The cashed tickets report may be combined with the transaction report;
- e. Amount of wagers (by ticket, writer/SAM, track/event, and total)
- g e. Tickets refunded (by ticket, writer, track/event, and total). Refund ticket report which lists for the day (session), for each ticket refunded: ticket number, ticket description, session, refund amount, and total of all refunds;
 - Note: The race and race number are not required to be identified on the refund tickets report if the transaction is reflected in the cashed tickets report or transaction report.
- f. Teller detail report which lists, by writer/cashier and in total: amount of tickets sold, tickets cashed, tickets canceled, returns, draws, sold, cashed, and amount of over/short;
- g. Teller balance report which lists for the day (session), by writer/cashier and in total: amount of tickets sold, tickets cashed, tickets canceled, draws (funds added to stations' accountability), returns (funds removed from stations' accountability), amount computed as cash turn-in, actual amount reported as cash turn-in, and amount of over/short;
- k-h. Futures reconciliation report which lists the amount of, by date of event/race for today and future event dates: wagers written on previous days (previous write), wagers written today on future events (write today or future write), wagers written on previous days refunded today (previous canceled today), wagers written on previous days for today's event/race (futures back-in), and total remaining wagers written for events/races in the future (net write);

i. Futures reports:

- 1) Futures back-in ticket detail report, which lists the tickets written on previous days for events/races occurring today by event/race meet, including: ticket number, ticket description, and date of event/race. The report lists the total amount of wagers written on previous days for today's event/race; and
- 2) Future ticket detail report, which lists the tickets written on previous days and today for events/races in the future, by date of event/race and by event/race including: ticket number, ticket description and date of event/race. The future tickets detail report lists totals of the amount of wagers by date of event/race, by event/race, and for all tickets.
- h-j. Unpaid winners/vouchers ("outs) (by ticket/voucher, track/event, and total). detail ticket report (i.e., outsbook tickets) which lists the unexpired winning tickets that have not been paid

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including: event/race date, ticket number, ticket description, amount of payout, and payout amounts in total.

Note: Tickets expire when the period of time the book will honor winning wagers has lapsed;

- k. Future wagers (by ticket, date of event, total by day, and total at the time of revenue recognition).
- e.k. Purged data (by ticket and total). detail ticket report which lists the expired winning tickets that have not been paid by meet, and by ticket number including: event/race date, ticket number, ticket description, and amount to be paid (net dividend). The report lists the total amount of net dividend by meet and the grand total for all meets. The report lists the total amount of payouts to be added back into revenue;

Note: Tickets expire when the period of time the book will honor winning wagers has lapsed.

- m.,n-]. Reconciliation report which lists for each meet, each race, and in total for all meets: net sales, negative Bbreakage data (by race and track/event), Ccommission data (by race and track/event), positive breakage, paid, and unpaid winning wagers (runner pay), parlay breakage, and deposit;
- m. Daily recap report which lists for each meet and in total for all meets: total write, refunds, net write, payouts paid today for events on previous days (outs paid today), payouts from wagers written today, and paid today (today's total paid or current payouts), unpaid winners from event/race that occurred today (today's outs or current unpaids), total amount paid today, unpaid winners expired today (outs purged today or unpaids to revenue), and beginning and ending unpaid winners balances (previous outs and total outs);
- n. Exception history report which lists for the day (session), exception time, employee involved, and dollar amount, if applicable, for pari-mutuel computer system function exceptions including, but not limited to, sign-on/offs and supervisor cancels; and
- j-o. Voids (by ticket, writer, and total). exception report (i.e., Cancelled Tickets Report) which lists for the day: ticket number, date and time of the void, station number, writer/cashier voiding the ticket, supervisor authorizing the void, and ticket description.
- p. Wagering account activity (summary of each account's activity by transaction type and account balance).
- 20. The system generates the following reports:
 - a. A daily reconciliation report that summarizes totals by track/event, including write, today's winning ticket total, total commission and breakage due the licensee, and net funds transferred to or from the licensee's bank account.

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- b. An exception report that contains a listing of all system functions and overrides not involved in the actual writing or cashing of tickets, including sign-on/offs, voids, and manually input paid tickets.
- c. A purged ticket report that contains a listing of ticket numbers, description, ticket cost and value, and date purged.
- 18. A month-end reconciliation report is created and used when computing pari-mutuel gross revenue which lists for each meet, by day, the amount of: net sales, negative breakage, commission, positive breakage, paid, and unpaid winning wagers (runner pay), parlay breakage, and deposit. The report lists the month-end totals for each meet and in total.

Accounting/Audit Procedures

- 21-19. The pPari-mutuel accounting/audit is conducted procedures are performed by someone personnel independent of the race, and sports, and pari-mutuel operations.
 - Note: Such personnel may also perform the <u>accounting/audit functions</u> for the outstation book of affiliated properties, (and vice versa).
- 22. Documentation (e.g., log, checklist, notation on reports, and tapes attached to original documents) us maintained evidencing the performance of pari-mutuel audit procedures, the exceptions noted and follow-up of all pari-mutuel audit exceptions.
- 23-20. An aAccounting/audit-employee_personnel examines the daily reconciliation report, compares it to the revenue summary produced by the system, and recalculates the net amount due to or from the systems operator. An accounting/audit employee reconciles transfers with the bank statements on a the sales and paid amounts on the report to the amounts on the daily recap report produced by the pari-mutuel computer system, and recalculate the net amount due to or from the hub. An accounting/audit employee reconciles the net amount due to or from the hub with the bank account information regarding transfers to and from the hub at least on a monthly basis.
- 24-21. Accounting/audit personnel verify daily cash turn-in by comparing the total actual cash turned in to the total cash turn-in-per pari-mutuel reports amount on the daily teller balance report.
 - Note: Cash turn-in is computed as follows: Beginning cash balance, (+) fills (draws), (+) net write (sold less voids), (-) payouts (net of IRS withholding), (-) payouts for tickets cancelled (+) funds added to station (draw) (-) funds removed from station (return)-moneybacks (paids), (=) cash turn-in (computed on hand).
- 25-22. For one race/event per day, accounting/audit personnel verify commissions per the daily reconciliation report by recalculating race/event commissions.

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- 26-23. For the track associated with the race/event selected above tested in ICP #22, accounting/audit personnel will-verify daily transfers due to and from the systems operator hub by recalculating the deposits.
 - Note: <u>The deposit amount is computed as follows:</u> Net sales, (+) negative breakage, (-) commissions, (-) positive breakage, (-) <u>paid and unpaid winning wagers (accrual pays)</u>, (=) deposit.
- 24. Accounting/audit personnel produce a pari-mutuel track fee report that lists, for each week and for the month, for each track and for all tracks in total, the track fees, and adjustments.
 - Note: The book receives from the hub, on a weekly basis, a track fee report that lists for the book, based upon the wagers accepted by the book, the track fees due by track.
- 27-25. Accounting/audit personnel-produce a gross revenue recap report to calculate gross revenue on a daily and month-to-date basis, including the following totals: trace the track/event fees and track/event fee adjustments to the monthly invoices received from the hub.
 - a. Commission.
 - b. Positive breakage.
 - c. Negative breakage.
 - d. Track/event fees.
 - e. Track/event fee rebates.
 - f. Purged tickets.
- 28-26. Accounting/audit personnel-trace the track/event fees and track/event fee rebates to the invoices received from the system operator produce a pari-mutuel gross revenue recap report to calculate gross revenue on a daily and month-to-date basis, including the following totals: commission, positive breakage, negative breakage, track/event fees, track/event fee adjustments, purged tickets, and gross revenue.
 - Note: The track fees and fee adjustments are included in the recap report in aggregate on a weekly basis.
- 29. At least weekly:
 - a. All winning tickets, vouchers, and cash are removed from the SAM by at least two employees.
 - b. SAM winning tickets and vouchers are ultimately delivered to the accounting department. Cash is immediately delivered to an appropriate area of accountability.

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- c. Winning tickets and vouchers deposited in each SAM are reconciled to the totals of SAM activity produced by the system. All variances are investigated, investigation results documented and maintained.
- d. The actual cash turn in from each SAM is reconciled to the amount reported by the system. All variances are investigated, investigation results documented and maintained.
- 27. Daily, accounting/audit personnel, for payouts made without pari-mutuel computer system authorization at the time of payment performs the following:
 - a. Trace all payouts to the pari-mutuel computer system transaction report or the purged tickets report to verify authenticity of the initial wager;
 - b. For payouts subsequently entered into the pari-mutuel computer system by race and sports book personnel, compare the manual payout amount to the pari-mutuel computer system amount; and
 - c. For payouts not entered into the pari-mutuel computer system by race and sports book personnel, enter the payout into the pari-mutuel computer system and compare the manual payout amount to the pari-mutuel computer system amount. If the system is inoperative, manually regrade the ticket to ensure the proper payout amount was made.
 - Note: Appeasement payments (e.g., nonwinning ticket payouts resulting from a customer complaint or employee error) are not deductible from gross revenue.
- 30-28. Accounting/audit personnel perform the following procedures for each day, unless indicated otherwise:
 - a. Review all System exceptions reports are reviewed for propriety of transactions and unusual occurrences. The review must includinge, but is not limited to, void authorizations and manually paid tickets. All noted improper transactions or unusual occurrences noted during the review of exception reports are investigated with the results documented.
 - Note: An exception report is defined as a report produced by the pari-mutuel computer system identifying unusual occurrences, changes to system configuration parameters, alteration to initially recorded data, voids, etc.
 - b. Review For all voidsed for propriety tickets:
 - 1) The pari-mutuel computer system reports which display voided ticket information are examined to verify that tickets were properly voided in the pari-mutuel computer system;
 - 2) The voided tickets are examined for a "void" designation and proper signatures, and for not-in-computer voids, the date and time stamp on the ticket for the time of the void; and

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- 3) For a pari-mutuel computer system that prints void tickets, a "void ticket" is attached to the original ticket.
- c. For one day per week, for one meet, verify the all race results as produced by the pari-mutuel computer system to the results provided by the wire service.
 - Note: Verifying the results is only required to be performed for one book (an outstation or satellite) when the same pari-mutuel computer system that maintains results information is shared by multiple affiliated books.
- d. For one day per week, regrade 10% or four tickets (whichever is greater) of paid (cashed) tickets to ensure accuracy and propriety—;
- e. When applicable, reconcile the daily totals of future tickets written to the totals produced by the system for both unearned and earned take, and review the reports to ascertain that future wagers are properly included on the day of the event.
- e. Daily, select a random sample of 5% or two tickets (whichever is greater) of paid transactions from the pari-mutuel computer system cashed tickets report and trace the transaction to the customer's copy of the paid ticket; and
 - Note: The same transactions selected for ICP #28(e) examination may be used as part of the sample selected for ICP #28(d).
- f. For <u>pari-mutuel only books</u>, for one day per week, review all wagers to determine whether any prehibited, nonpari-mutuel wagers were accepted.
 - Note: This audit procedure applies to "pari-mutuel only" books.
- 31-29. Monthly, accounting/audit personnel reconcile gross revenue from the month-end pari-mutuel gross revenue recap report to the general ledger-accounting records to the monthly Nevada Gaming Commission ("NGC") tax returns. This The reconciliation is documented and maintained. All variances are supported by documentation, are reviewed, documented, and maintained. Any variances noted are resolved prior to submission of the tax returns.
- 32-30. Quarterly, an inventory of all sensitive pari-mutuel keys is performed and reconciled to records of keys made, issued, and destroyed. Investigations are performed for all keys not accounted for, with the investigations being documented.
 - Note: Sensitive keys include, but are not limited to, keys used to access restricted pari-mutuel computer storage media and/or restricted equipment used to conduct the pari-mutuel book and to the date and time stamping machines.

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- 33-31. Annually, for one day, accounting/audit personnel will perform the following for one writer/cashier station:
 - a. Foot the wagers on the restricted pari-mutuel computer system record and trace to the total produced by the pari-mutuel computer system; and
 - b. Foot the customer copy of paid tickets and trace to the total produced by the <u>pari-mutuel</u> <u>computer</u> system.
 - c. Foot cashed vouchers and trace to the total produced by the system.
- 34-32. At least one day per quarter, accounting/audit personnel: will recalculate and verify the change in the unpaid winners balance to the total purged tickets.
 - a. Recalculate and verify the change in the unpaid winners balance to the total purged tickets; and
 - b. If future wagers are accepted, review the pari-mutuel computer system reports to ascertain that future wagers are properly included in write on the day of the event.

Credit Accounts

- 35. Pari-mutuel credit procedures must comply with the requirements of the Cage and Credit Internal Control Procedures. If credit adjustments are listed on the NGC tax returns, the requirements of Regulation 6.120 must also be met.
- 22-33. Documentation (e.g., log, checklist, notation on reports, and tapes attached to original documents, etc.) is maintained evidencing the performance of pari-mutuel accounting/audit procedures, the exceptions noted and follow-up of all pari-mutuel audit exceptions. All changes made to pari-mutuel documents by accounting/audit personnel are distinguishable (e.g., made in red ink) from those made during the preparation of the document.

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